THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MATTHEW ADKISSON, an individual,

        Plaintiff,

    v.

EPIK HOLDINGS, INC., a Washington
Corporation; EPIK INC., a Washington
Corporation; MASTERBUCKS LLC, a
Wyoming company; ROBERT W.
MONSTER, an individual; and BRIAN
ROYCE, an individual,

        Defendants.

No. 2:23-cv-00495 MJP

DECLARATION OF STEVE GREENSPAN

I, Steve Greenspan, declare as follows:

1.   I am a resident of Huntington, New York and make this declaration based on my personal knowledge.

2.   I maintain an account of approximately 2,700 domain names through Epik's services on Epik.com. To ensure that I timely renew the domain names I own, I routinely bulk renew domain names that are set to expire soon using Epik's services which identify domain names that will be expiring soon.

3.   On or around March 14, 2023, I renewed all of the domains in my account that were set to expire soon. However, unknown to me, at the time I renewed those domain names,

STEVE GREENSPAN DECLARATION
(NO. 2:23-CV-495 MJP) – 1

several domain names I owned were not appearing listed in my account at that time. That meant that when I selected domain names to renew, I was unable to renew those domain names.

4.   On March 30, 2023, I received a notice from Epik that several domain names I owned were about to expire, including the domain name <clickfunnel.marketing>, despite that I had just paid to renew any domain names that were expiring soon.

5.   On May 3, 2023, I paid Epik $199 to redeem the <clickfunnel.marketing> domain name to ensure it stayed under my control and did not go back to the open market. The payment went through, and I received a receipt from Epik. However, Epik did not renew or redeem the domain name and I lost the domain name. The <clickfunnel.marketing> is now available and listed for sale on the open market, despite that I already paid Epik to retain the domain name.

6.   I have also had numerous other issues with Epik accepting payment and not performing the services they promised to. For instance, on April 8, 2023, I paid $34.95 to Epik to transfer a domain name from another registrar to Epik. Epik accepted my payment, but the domain name has yet to successfully transfer in to my Epik account as the transfer remains stalled. I also paid Epik $120 to renew eight other domain names on or around April 14, 2023. Again, I received a receipt and Epik accepted the payment, but Epik did not renew those domain names. Additionally, I use Epik's hosting services for several of my websites, and pay Epik $29/month for such services. However, despite accepting my payment, Epik recently cut off access to by webmaster without explanation and as a result, I have been unable to make necessary and critical updates to my websites.

7.   Most recently, on May 26, 2023, I paid Epik $15.99 from funds in my Epik account to renew a domain name. I received a receipt for the transaction and the payment was taken out of my Epik account. However, the domain name was not renewed. Now, Epik notified me that I would need to pay $90 to redeem the same domain name in order to not lose it.

8.   I have attempted to contact Epik support regarding these issues, and others, and multiple occasions including by phone, e-mail and USPS priority mail. Epik's customer support

STEVEN GREENSPAN DECLARATION
(NO. 2:23-CV-495 MJP) – 2

162300037.1

contact information appears to be purposefully devised to frustrate the consumer without being able to reach any support personnel at Epik. I was finally recently contacted by an Epik employee who informed me that all of my prior e-mails went into a "spam" folder at Epik. Regardless, to date, the issues remain and I have not been refunded any of the payments Epik accepted for services they did not perform.

9.   As of May 28, 2023, I have now been locked out of the Epik account meaning that I cannot renew any of my domain names I hold through Epik and many of them are at risk of expiring soon.

10.   These actions have caused me significant frustration and forced me to waste both my time and resources to try to rectify the issue, and I have lost several domain names because of Epik's actions and am at risk of losing many others.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 30th day of May, 2023, in Huntington, New York.

DocuSigned by:

Steve Greenspan

F88E757E343B482...

Steve Greenspan

STEVEN GREENSPAN DECLARATION
(NO. 2:23-CV-495 MJP) – 3

162300037.1